

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re: FAIRFIELD SENTRY LIMITED, et al., Debtor in Foreign Proceedings.	Chapter 15 Case Case No. 10-13164 (CGM) Jointly Administered
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. THEODOOR GGC AMSTERDAM, et al., Defendants.	Adv. Pro. No. 10-03496 (CGM) Administratively Consolidated
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. ABN AMRO SCHWEIZ AG, et al., Defendants.	Adv. Pro. No. 10-03635 (CGM)
FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. ABN AMRO SCHWEIZ AG, et al., Defendants.	Adv. Pro. No. 10-03636 (CGM)

**JOINDER OF BANK J. SAFRA SARASIN AG, F/K/A BANK SARASIN & CIE TO
HSBC DEFENDANTS' (1) OBJECTION TO LIQUIDATORS' PROPOSED
SCHEDULING ORDER ON PERSONAL JURISDICTION BRIEFING AND
DISCOVERY AND (2) NOTICE OF COUNTER-PROPOSED ORDER**

Bank J. Safra Sarasin AG, f/k/a Bank Sarasin & Cie, by and through its undersigned counsel, hereby respectfully joins in: (i) the *HSBC Defendants' (1) Objection to Liquidators' Proposed Scheduling Order on Personal Jurisdiction Briefing and Discovery and (2) Notice of Counter-Proposed Order* (ECF No. 3884)¹ (the "HSBC Objection") to the *Notice of Filing and Presentment of Scheduling Order on Personal Jurisdiction Briefing and Discovery* (the "Liquidators' Proposed Order") filed by the Liquidators on September 23, 2021 (ECF No. 3883); and (ii) the HSBC Defendants' counter-proposed order accompanying the HSBC Objection (ECF No. 3884-1) (the "HSBC Defendants' Proposed Order").

Bank J. Safra Sarasin AG, f/k/a Bank Sarasin & Cie intends to move to dismiss the complaints in the above-captioned adversary proceedings (the "Complaints") for lack of personal jurisdiction, and specifically intends to establish in its briefing that the Complaints do not allege a prima facie case for personal jurisdiction over Bank J. Safra Sarasin AG, f/k/a Bank Sarasin & Cie.

For the reasons set forth in the HSBC Objection, Bank J. Safra Sarasin AG, f/k/a Bank Sarasin & Cie objects to the Liquidators' Proposed Order, and respectfully requests that the Court enter the HSBC Defendants' Proposed Order.

¹ Unless otherwise noted, references to "ECF No. ____" are to entries in Adv. Pro. No. 10-03496.

Dated: September 28, 2021
New York, New York

Respectfully submitted,

SULLIVAN & CROMWELL LLP

/s/ Andrew J. Finn

Andrew J. Finn
Jeffrey T. Scott
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: finna@sullcrom.com
E-mail: scottj@sullcrom.com

*Counsel for Bank J. Safra Sarasin AG, f/k/a Bank
Sarasin & Cie*